

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION

JOHN DOE)	
Plaintiff)	
)	
v.)	CASE NO. 3:21-cv-00144-TWP-MJD
)	
UNIVERSITY OF SOUTHERN INDIANA,)	
DAMEION DOSS,)	
BETH DEVONSHIRE,)	
D. STAFFORD & ASSOCIATES,)	
KAREN NUTTER, and)	
GRAND RIVER SOLUTIONS, INC.)	
Defendants)	

SUPPLEMENTAL JOINT REPORT ON STATUS OF DISCOVERY

Comes now Plaintiff, John Doe (“Doe”), and Defendants, University of Southern Indiana (“USI”), Dameion Doss (“Doss”), Beth Devonshire (“Devonshire”), D. Stafford & Associates (“Stafford”), Karen Nutter (“Nutter”), and Grand River Solutions, Inc. (“Grand River”), and pursuant to this Court’s Scheduling Order dated May 24, 2023 [ECF No. 224], provide their Supplemental Joint Report on the Status of Discovery:

1. A detailed description of all discovery completed in past 28 days.
 - A. Plaintiff conducted the deposition of Christopher Bayh on July 14, 2023.
2. A detailed description of all discovery presently scheduled or pending, including the due dates for any pending discovery requests and the scheduled dates for any depositions, and the identity of the counsel responsible for completing such discovery.
 - A. Plaintiff is scheduled to take the following depositions. Counsel Robert Burkart will be responsible for taking these depositions.
 - i. Dameion Doss on July 25, 2023;

- ii. Dolores Stafford on August 16, 2023;
- iii. Shelley Blunt on August 18, 2023;
- iv. Ron Rochon on August 18, 2023;
- v. Andrew Lenhardt on August 19, 2023;
- vi. Jody Shipper on August 29, 2023;
- vii. Karen Nutter on August 30, 2023;
- viii. Beth Devonshire on September 26, 2023.

B. Responses to USI's Second Interrogatories to Plaintiff served on June 27, 2023 are currently due July 27, 2023. Counsel Robert Burkart or Matt Koressel will be responsible for completing this discovery. Plaintiff will supplement two Interrogatory Answers on July 28, 2023.

3. Plaintiff and Defendant USI had a meet and confer on July 18, 2023, in regard to Defendant USI's Response to First and Fourth Requests for Production. Defendant USI is producing its insurance policy(ies) applicable to this case. Meet-and-confer is continuing for the purpose of joint confirmation of the completeness of USI's production of non-privileged, specified documents responsive to thirty of Plaintiff's 189 document requests. USI has produced more than 10,000 pages to date.

4. A detailed description of all discovery that is planned to be completed within the 28-day period following the report, including the identity of the counsel responsible for completing such discovery.

A. As stated above, Plaintiff intends to complete the depositions of Dameion Doss, Shelley Blunt, Ron Rochon, Andrew Lenhardt, and Dolores Stafford within 28

days or shortly thereafter of filing this Report. Counsel Burkart will be responsible for completing those depositions.

B. Plaintiff intends to complete his answers to USI's Second Interrogatories to Plaintiff on or before July 27, 2023. Counsel Robert Burkart or Matt Koressel will be responsible for completing this discovery.

5. A description of all known discovery to be completed in this matter, including a proposed timetable for the completion of such discovery and the identity of the counsel responsible for completing such discovery.

A. In addition to the above depositions, Plaintiff intends to take the depositions of Aaron Trump, a USI 30(B)(6), and Demetrius Peterson. Demetrius Peterson has been served with a deposition subpoena, and Plaintiff's counsel is trying to coordinate a date with Mr. Peterson. Counsel Robert Burkart will be responsible for taking these depositions. Plaintiff may seek leave to serve additional Requests for Admission and Interrogatories. Plaintiff reserves the right to take additional depositions or serve additional discovery as trial preparation and discovery continues.

B. Defendants USI, Doss, and Devonshire will perform the following discovery:

- i. Depositions of Plaintiff John Doe and Keith Vonderahe; to be conducted by Attorney William Kealey; anticipated to occur in September-October 2023.
- ii. Depositions of Plaintiff John Doe's roommates/teammates, including but not limited to, Braden Matthews, Sam Benoist, and Cade Walsh, and soccer coach(s), including but not limited to, Mat Santoro; to be conducted

by Attorneys William Kealey or Joseph Harrison III; anticipated to occur in September-October 2023.

- iii. Subpoenas to issue in July-August 2023 to above-referenced roommates/teammates and/or soccer coach(s) for emails and text messages.

6. Any other discovery issues any party believes should be brought to the attention of the Court so as to avoid any further delays in the completion of discovery in this matter.

A. On July 18, 2023, Plaintiff filed a Motion for Extension of Expert Witness Deadlines [Dkt. 264], and Defendants have no objection to such extension. The Motion would extend Plaintiff's expert deadline to October 3, 2023, and Defendants' expert witness deadline until November 3, 2023.

Respectfully submitted,

/s/ Matthew S. Koressel

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